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June 6, 2024

**Via ECF**

The Honorable Joanna Seybert  
United States District Judge  
Eastern District of New York  
610 Federal Plaza  
Central Islip, New York 11722

**Re: US v. George Devolder Santos (23-cr-197) (S-2) (JS)**  
**Request to Modify Conditions of Release**

Dear Judge Seybert:

We represent George Devolder Santos, the Defendant in the above-referenced matter. We write to request a modification of Mr. Santos' conditions of release to add a "Mt. Pocono and surrounding area" as a regular access area to the governing Order Setting Conditions of Release and Appearance Bond (ECF 12) ("Order"). Mr. Santos' U.S. Pretrial Services Officer Amanda Sanchez has no objection to this request. Additionally, the Government has no objection to this request.

Currently per the Order, Mr. Santos is restricted to travel within "New York City", "Long Island", "District of Columbia", and "Other travel in continental United States w/ advanced notice Gov/Pretrial." See ECF 12. Over the summer months, Mr. Santos intends to make regular visits to Tobyhanna, Pennsylvania, which is located approximately 7 miles north of Mt. Pocono. Mr. Santos is currently permitted to travel to this location upon prior notice to Ms. Sanchez. However, he expects to travel weekly to the Mt. Pocono area and therefore seeks to add this location to the Order to avoid submitting weekly travel requests to Ms. Sanchez.

Mr. Santos has complied with all bail conditions to date, including regular check-ins and any travel restrictions currently imposed by the Court. Mr. Santos has already advised Ms. Sanchez of the specific address that he will be frequenting in the Mt. Pocono area and will continue to comply with all existing requirements and conditions contained in the Order

We are available to provide any additional information the Court may require and are prepared to discuss this request further at the Court's convenience. We thank the Court for its time and attention to this matter.

Respectfully submitted,



Robert Fantone

cc: All counsel of record via ECF

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